

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES of the CHICAGO REGIONAL)	
COUNCIL OF CARPENTERS PENSION)	
FUND, et al.,)	
)	
Plaintiffs,)	Case No. 21-cv-2973
)	
)	Judge Robert W. Gettleman
)	
v.)	
)	
AR INTERIORS, LLC and ADAM J. LICHON,)	
)	
Defendants.)	

Motion to Reinstate and for Judgment (Agreed)

Plaintiffs, by its attorney, Daniel P. McAnally, move this Honorable Court to reinstate this case and enter judgment and in support state:

1. This motion is agreed to by the parties and there are no objections.
2. This is an ERISA trust fund case for delinquent contributions.
3. On July 21, 2021 this case was dismissed with leave to reinstate pursuant to the settlement of the parties. (*Exhibit A, Agreed Order of Dismissal*)
4. The Plaintiffs and Defendant entered into a settlement agreement, whereby the Defendant agreed to pay \$158,830.59 in partial payments, Exhibit A, paragraph three. If the Defendant defaulted on the payments, the Plaintiffs retained the right to reinstate this case and enter judgment for the balance owed on the payment arrangement.
5. Additionally, in the event of a breach, the owner, Adam J. Lichon, agreed to be personally liable for the dues deducted from the employees' paychecks in the amount of \$5,058.33.

6. The Defendant defaulted on the agreement by failing to make payments on the agreed amount. As a result of the default the Defendant now owes the Plaintiff \$145,481.22. Also, Adam J. Lichon is personally responsible for the dues in the amount of \$4,725.65.

7. The parties agree that it is in the best interests of both parties to enter into an agreed judgment against both parties.

WHEREFORE, the Parties' respectfully request that this case be reinstated and that judgment be entered against AR Interiors, LLC in the amount of \$145,481.22 and against Adam J. Lichon, personally in the amount of \$4,725.65.

Respectively submitted,

s/ Daniel P. McAnally
Attorney for Plaintiffs

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